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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 COURTNEY IMRIE,

16 Case No.: 2:19-cv-01556-GMN-BNW

17 Plaintiff,

18 vs.

19 HACHIMAN, LLC, a domestic limited
20 liability company; and, PALOMINO CLUB, a
21 domestic limited liability company,

22 Defendants.

23 **JOINT STIPULATION AND REQUEST TO**
STAY PROCEEDINGS PENDING
RESOLUTION

24 **(First Request)**

25 Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, Plaintiff Courtney Imrie (“Plaintiff”) and
26 Defendants Hachiman, LLC and Palomino Club, LLC (collectively the “Defendants”), by and
27 through their respective counsel of record, hereby stipulate and request that this Court stay the above-
captioned case for one-hundred eighty days (180) days, up to and including June 16, 2021. This
Request for a stay is not sought for any improper purpose or other purpose of delay. Rather, it is
sought only to conserve the parties’ and court’s respective resources while the parties work on
completing a structured settlement. In support of this Stipulation and Request, the parties state as
follows:

1 1. Pursuant to the Stipulated Discovery Plan and Scheduling Order approved by the
2 Court on October 19, 2020, and the parties' fourth request for an extension of discovery and related
3 deadlines, approved by the Court on October 20, 2020 the current deadline for completion of
4 discovery in this case is January 11, 2021. **ECF No. 28.**

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6 2. In the fourth request for an extension of the discovery period, the parties informed the
7 Court they were working on resolving this matter before investing additional resources in taking
8 depositions and summary judgment practice . **Id.** Since that time, the parties have worked amicably,
9 diligently, and creatively to achieve a resolution acceptable to each.

10 3. On December 17, 2020, the parties reached a settlement in theory and are moving
11 forward with drafting the settlement agreement. The settlement is structured and the parties
12 anticipate that it will take approximately six-months to complete.¹

13 **** REMAINDER OF PAGE INTENTIONALLY LEFT BLANK ****

27 1 If the Court requests further information regarding the parties' settlement efforts, the parties are willing to file a
28 confidential supplement for *in camera* review.

1 WHEREFORE, the parties respectfully request that this Court stay this matter for one-hundred
2 eighty days (180) days, up to and including June 16, 2021.

3 DATED this 18th day of December 2020.
4

5 Respectfully submitted,
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7 KEMP AND KEMP
8

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Hachiman, LLC and
Palomino Club, LLC

16 IT IS SO ORDERED.
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18

19 _____
20 UNITED STATES MAGISTRATE JUDGE
21

22 _____
23 DATED
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